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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

*In re: Kia Engine Litigation* ) Case No.: 8:17-cv-00838-JLS-JDE

## **CLASS ACTION**

**[PROPOSED] ORDER APPOINTING  
INTERIM CLASS COUNSEL**

**WHEREAS**, Plaintiffs Christopher Stanczak, Rose Creps, Cara Centko, and Jenn Lazar (together, “Plaintiffs”) have moved for an order appointing Matthew Schelkopf of Sauder Schelkopf LLC and Adam Gonnelli of the Sultzer Law Group as Interim Co-Lead Counsel, and the appointment of Bonner Walsh of Walsh PLLC to the Executive Committee, (collectively, “Interim Class Counsel”).

**WHEREAS**, the Court has considered the following factors: (1) the work done by proposed Interim Class Counsel in identifying and/or investigating potential claims in the action; (2) proposed Interim Class Counsel's experience in handling class actions, other complex litigation, and claims of the type asserted in this action; (3) proposed Interim

1 Class Counsel's knowledge of the applicable law; and (4) the resources that proposed  
2 Interim Class Counsel will commit to representing the class;

3 **IT IS HEREBY ORDERED:**

4 1. Pursuant to Fed. R. Civ. P. 23(g)(3), Matthew Schelkopf and Adam Gonnelli  
5 are hereby appointed Interim Co-Lead Counsel with the sole responsibility for and  
6 authority over the following matters on behalf of all Plaintiffs in this action:

7 a. To determine and present (in briefs, oral argument, or such other fashion as  
8 may be appropriate, personally or by a designee) to the Court and opposing parties  
9 the position of Plaintiffs and putative class members on all matters arising during  
10 pretrial proceedings;

11 b. To coordinate the initiation and conduct of discovery on behalf of Plaintiffs  
12 and putative class members, consistent with the requirements of Federal Rule of  
13 Civil Procedure 26(b)(1), 26(b)(2), and 26(g), including the preparation of  
14 interrogatories and requests for the production of documents and the examination  
15 of witnesses in depositions;

16 c. To conduct settlement negotiations on behalf of Plaintiffs and putative class  
17 members, where appropriate, to present any proposed settlements to the Court on  
18 behalf of putative class members;

19 d. To delegate specific tasks to the Executive Committee or other counsel or  
20 groups of counsel, as authorized by the Court, in a manner designed to ensure that  
21 pretrial preparation for Plaintiffs and the putative class is conducted efficiently and  
22 effectively;

23 e. To enter into stipulations with opposing counsel as necessary for the conduct  
24 of the litigation;

25 f. To prepare and distribute status reports to any other law firms that might  
26 seek to represent the putative class;

27 g. To maintain adequate time and disbursement records covering services as  
28 Interim Class Counsel;

h. To monitor the activities of any other law firms that might seek to represent putative class members to ensure that schedules are met and unnecessary expenditures of time and funds are avoided; and

- i. To perform such other duties as may be incidental to the proper prosecution and coordination of pretrial activities on behalf of Plaintiffs and the putative class or authorized by further order of this Court.

2. Unless otherwise ordered by the Court upon a showing of good cause, this Order shall apply to any action filed in, transferred to, or removed to this Court, which relates to the subject matter at issue in the Action.

**IT IS SO ORDERED** on this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

**Hon. Josephine L. Staton  
United States District Judge**